



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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February 1, 2001

Ref: 8ENF-L

John R. Jacus
Davis, Graham & Stubbs
1550 17th Street, Suite 500
Denver, CO 80202
VIA FACSIMILE & REGULAR MAIL

Re: Hecla Mining Co.,
Docket No. RCRA-8-99-06

Dear John:

EPA is responding to two of the outstanding issues from our meeting on January 25, 2001. First, we have discussed the scope of the ecological risk assessment with an Agency toxicologist. If Hecla concurs, EPA would agree that initially Hecla would only need to perform a screening-level ecological risk assessment. This would include Step 1 and Step 2 of the 8-step ecological risk assessment process for Superfund. Hecla would not be required to go beyond Step 2 if it presents data demonstrating that the ecological threats from Pond 2 are negligible. If data indicate, however, that there is or might be a risk of adverse ecological effects, the ecological risk assessment process must continue. I will mail a hard copy of Step 1 and Step 2 from the document titled "Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments, July 1997." This document can also be downloaded from EPA's website at www.epa.gov/superfund/programs/risk/ecorisk.

Secondly, I am attaching EPA's preferred analysis methods for the soil and leachate samples. We have attempted to address the remaining issue regarding the locations of the well or wells, but unfortunately will not be able to discuss this with the Agency's geohydrologist until February 5. I will follow-up with you as soon as possible thereafter.

We appreciated receiving the topographic map and sampling results so quickly after our meeting last week. As soon as we receive our final data package from the laboratory, which is expected by February 16, I will forward a copy to you and to Hecla.

Sincerely,

Lauren C. Buehler
Enforcement Attorney

cc: Janice Pearson



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